

Application No.: 10/814,306

REMARKS

Claims 1-6 and 8 stand rejected under 35 U.S.C. § 102 as being anticipated by Ghosh (previously of record). Claim 1 is independent. This rejection is respectfully traversed for the following reasons.

Claim 1 recites in pertinent part, "a plurality of simulator models each including a functional model workable as a CPU constituting a system to be simulated, peripheral hardware or buses connecting the peripheral hardware to the CPU; *plural types of interfaces included in each* of the simulator models and enabling plural types of simulators for various uses to access to the functional models ..." (emphasis added). The Examiner alleges that Ghosh discloses plural types of interfaces based on the disclosure at section 3.1.1 thereof which states that "some BFM's may support methods that are not supported in others." However, it is respectfully submitted that the alleged "plural types of interfaces" in Ghosh are NOT for *each* of the simulator models. Rather, different interfaces are used for different simulators. This is clearly shown in Figure 1 of Ghosh, in which only one interface is used in a given simulator (compare to Figure 1 of Applicants' drawings, which illustrate an exemplary embodiment in which plural interfaces can be included in each model).

As anticipation under 35 U.S.C. § 102 requires that each and every element of the claim be disclosed, either expressly or inherently (noting that "inherency may not be established by probabilities or possibilities", *Scaltech Inc. v. Retec/Tetra*, 178 F.3d 1378 (Fed. Cir. 1999)), in a single prior art reference, *Akzo N.V. v. U.S. Int'l Trade Commission*, 808 F.2d 1471 (Fed. Cir. 1986), based on the forgoing, it is submitted that Ghosh does not anticipate claim 1, nor any claim dependent thereon.

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are

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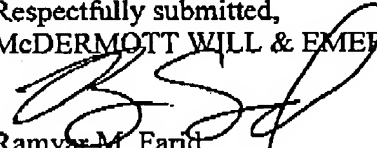
contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819 F.2d at 1100, 1108 (Fed. Cir. 1987). Accordingly, as claim 1 is patentable for the reasons set forth above, it is respectfully submitted that all claims dependent thereon are also patentable. In addition, it is respectfully submitted that the dependent claims are patentable based on their own merits by adding novel and non-obvious features to the combination.

Based on the foregoing, it is respectfully submitted that all pending claims are patentable over the cited prior art. Accordingly, it is respectfully requested that the rejection under 35 U.S.C. § 102 be withdrawn.

CONCLUSION

Having fully responded to all matters raised in the Office Action, Applicants submit that all claims are in condition for allowance, an indication for which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below. To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,
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